



## **HHS Circular C-031**

### **Ethics Training for HHS Employees**

#### **Purpose**

To inform health and human services (HHS) agency employees that all HHS staff are required to complete ethics training. Each employee must complete one of two computer-based ethics training programs. Staff who meet the guidelines set forth in the Discussion/Requirements section below are required to complete *Ethics Training for Contracting and Procurement Personnel* (Ethics Training for C&PP). All other staff must complete *Ethics Training for HHS Employees*.

#### **Background**

HHS employees are expected to maintain the highest standards of conduct in the performance of their duties while serving our clients and the taxpayers of Texas. Public servants should act fairly and honestly, avoiding even the appearance of impropriety. To achieve that goal, on November 19, 2013, the HHSC Internal Audit Division released its Audit of Organizational Governance. The findings of the audit support maintaining a strong ethics program at HHS. One of the recommendations, Recommendation 8, provides all HHSC employees to complete ethics training shortly after their employment begins and every two years thereafter. (See HHSC, Internal Audit Division, Audit of Organizational Governance, Project Number 11-02-007, November 19, 2013, pp. 40-42.) To achieve the goals as stated in the audit, pursuant to this circular, all HHS employees are required to complete ethics training.

Many current HHS staff are already required to complete the computer-based *Ethics Training for C&PP*. This training was updated in April 2015 by the HHS Ethics Office and will continue to be updated on a regular basis to reflect changes in law, rule, or policy. Staff not taking *Ethics Training for C&PP* must complete *Ethics Training for HHS Employees*.

#### **Discussion/Requirements**

Agency staff required to complete *Ethics Training for C&PP*, are those with:

- procurement and contract approval authority, including executive management, financial, and legal staff;
- procurement responsibilities, including bid/proposal evaluators;



- contract management and monitoring responsibilities;
- contract oversight and support responsibilities; and
- discretion to select services and/or providers for clients.

All other staff must take *Ethics Training for HHS Employees*. This ethics training is designed to give HHS employees a general knowledge of all relevant ethics laws, rules, and policies.

The ethics training assignment for agency employees is determined by the agency commissioner or designee.

Current employees have 90 days from the effective date of this circular to complete the *Ethics Training for HHS Employees* program. Subsequent training is then required every two years from the date of completion. Employees who are required to take *Ethics Training for C&PP*, but have not completed the course within the last two years, must complete that course with 90 days and with subsequent training every two years from the date of completion.

New employees are required to complete the training within 60 days of their employment start dates.

## **Inquiries**

Questions regarding the content of this circular should be directed to the HHS Chief Ethics Officer or the HHS Ethics Advisor assigned to your agency.